



SEPA Proxy Lookup (SPL) Scheme Rulebook 2019 Change Proposal Submission Document Following the 2019 Public Consultation on SPL Scheme Change Requests

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Public

SPL Scheme Rulebook

2019 Change Proposal Submission Document

EPC153-19

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1 Introduction

It is a key objective of the EPC that the SEPA Proxy Lookup (SPL) scheme is able to develop with an evolving payments market. To meet the demands of the scheme participants and stakeholders including end-users and PSP communities, the SPL scheme is subject to a change management process that is structured, transparent and open, governed by the rules of the management and evolution function of SEPA scheme management.

The first step in the SPL scheme change management cycle is the introduction of change requests by any party with a legitimate interest. The change request submission period ended on 31 March 2019.

In consideration of the change requests received, the EPC's SPL Scheme Participant Group (SPL SPG) develops a public consultation document, containing the change requests and the related SPL SPG recommendations following a detailed analysis.

All submitted change requests to modify the SPL scheme rulebook received by the EPC are published through the public consultation document on the EPC website, permitting such a list to be openly viewed by all stakeholders. This public consultation ran from 24 May until 26 August 2019.

Following the termination of the three-month public consultation, the SPL SPG collects and analyses the level of support and comments received for each change request, based on which it prepares change proposals.

A change proposal as developed by the SPL SPG may bring together more than one change, developed from one or more change requests.

The SPL SPG consolidates the change proposals, along with each change request and the related non-confidential comments received from the contributors during the public consultation, in the change proposal submission document.

The change proposal submission document is then submitted to the EPC Board for decision-making purposes. The Board deliberates on the change proposal submission document from the SPL SPG.

Finally, the change proposal submission document is published on the EPC website along with the decision of the Board on each change proposal.

2 Executive summary

This change proposal submission document (EPC153-19) describes that each stage of the 2019 SPL scheme rulebook change management cycle, from the initiation to the public consultation, has been properly completed in respect of each change request submitted.

The first step in the change management cycle was the submission of change requests to the SPL scheme by any party with a legitimate interest. The change request submission period ended on



31 March 2019. The EPC received a total of 11 change requests for major changes to be introduced into the SPL scheme rulebook.

The public consultation on possible modifications to be introduced into the SPL scheme rulebook ran from 24 May until 26 August 2019. The following documents were published on the EPC website (link: <https://www.europeanpaymentscouncil.eu/document-library/other/sepa-proxy-lookup-spl-scheme-rulebook-2019-change-request-public>):

- SPL Scheme Rulebook 2019 Change Request Public Consultation Document (EPC103-19).
- Response template SPL Scheme Rulebook 209 Change Request Public consultation (EPC104-19).

This Change Proposal Submission Document contains for each change request:

- A description of the change request.
- The SPL SPG recommendation provided as input for the public consultation.
- The SPL SPG change proposal following the analysis of the public consultation results.
- Overview table containing the following information:
 - Contributor name.
 - Contributor support of the SPL SPG recommendation.
 - Contributor comments.
 - SPL SPG response on comments received.
- The Board decision on each SPL SPG change proposal.

As a result of the 2019 SPL scheme rulebook change management process, the rulebook has been updated to include:

- The email address and reachability check as optional features in the SPL scheme.
- The specification of a maximum liability amount equal to the fee paid to the responding registry provider (RRP) for the provision of the data (section 2.6.2 Limits on liability of the rulebook).
- The possibility for a SPL scheme participant in its role of RRP to charge a fee in exchange of services received by the IRP (section 2.3.1 Application process of the rulebook).

In addition, the minor changes as defined in section 6.3 as well as a number of editorial updates to provide further clarification, ensure alignment with updated EPC processes or regulations or to correct typos have been included in version 2.0 of the SPL scheme rulebook.

3 Overview 2019 major change requests and final Board decision

Item	Change request	Final Board decision
1	Email address to be included as an additional alias	To be incorporated as an optional feature in the next version (v2.0) of the SPL scheme rulebook.



Item	Change request	Final Board decision
2	Increase scope to merchant payments (payments at POI)	Not to be included in the next version (v2.0) of the SPL scheme rulebook.
3	Notifications	Not to be included in the next version (v2.0) of the SPL scheme rulebook.
4	Allow participants from outside Europe	Not to be included in the next version (v2.0) of the SPL scheme rulebook.
6	Payment requests.	Not to be included in the next version (v2.0) of the SPL scheme rulebook.
7	Support customer onboarding.	To be incorporated as an optional feature in the next version (v2.0) of the SPL scheme rulebook.
8	Disclosure information by Initiating Registry Provider (IRP) to its customers.	Not to be included in the next version (v2.0) of the SPL scheme rulebook.
9	Additional end-to-end data security/integrity requirement.	The possible inclusion of the Change Request is to be postponed until the next change management cycle.
10	Extending proxies & revisit/update participants eligibility requirements.	Not to be included in the next version (v2.0) of the SPL scheme rulebook.
14	Maximum liability amount.	To be included in the next version (v2.0) of the SPL scheme rulebook.
18	Responding Registry Provider (RRP) fees.	To be included in the next version (v2.0) of the SPL scheme rulebook.



4 Overview of Change Requests submitted for the the 2019 Public Consultation

4.1 Background

This section lists the change requests which were presented for public consultation along with the recommendation given by the SPL SPG for each change request. Each recommendation reflects one of the following options:

- a) The change request is **already provided for** in the scheme: no action is necessary for the EPC.
- b) The change request **should be incorporated into the scheme**: the change request becomes part of the scheme and the rulebook is amended accordingly.
- c) The change request **should be included in the scheme as an optional feature**:
 - The new feature is optional, and the rulebook will be amended accordingly;
 - Each scheme participant may decide to offer the feature to its customers, or not.
- d) The change request **is not considered fit for the SEPA geographic area**
- e) The change request **cannot be part** of the scheme for one of the following reasons:
 - It is technically impossible or otherwise not feasible (to be explained on a case by case basis);
 - It is out of scope of the EPC.

4.2 Summary of change requests and the expressed support following the public consultation

Table 1 below provides an overview of the level of support from the contributors regarding the SPL SPG recommendations presented during the public consultation. The list of contributors can be found in Annex I.

The contributors were invited to indicate (in the response template) their support concerning each SPL SPG recommendation via providing a “Yes”, “No” or “No opinion” response. Kindly note that the number of “No Opinion” positions have not been taken into account when determining the level of support for each change request.

Some contributors also provided additional comments which have been listed for each change request under “Public consultation feedback” (section 5).



Item	Change Request	EPC SPL SPG recommendation	Count "Yes"	Count "No"	Count "No opinion"
1	Email address to be included as an additional alias	Should be incorporated as an option into the scheme - option c	3	1	0
2	Increase scope to merchant payments (payments at POI)	Cannot be part of the existing scheme – option e	3	0	1
3	Notifications (credit transfer initiated/money received)	Cannot be part of the existing scheme – option e	3	1	0
4	Allow scheme participants from outside Europe	Not considered fit for the SEPA geographic area – option d	4	0	0
6	Payment requests.	Cannot be part of the existing scheme – option e	3	1	0
7	Support customer onboarding.	Should be incorporated as an option into the scheme - option c	3	1	0
8	Disclosure information by Initiating Registry Provider (IRP) to its customers.	Cannot be part of the existing scheme – option e (Note: The SPL SPG has however submitted an alternative change request related to this topic (see EPC103-19: section 5, item #12).)	2	1	1
9	Additional end-to-end data security/integrity requirement	Should be incorporated into the scheme - option b	4	0	0
10	Extending proxies & revisit/update participants eligibility requirements.	The change is already provided for in the scheme – option a (Note: The SPL SPG is however interested to learn from the market what other proxy types, account identifiers and use cases would be required in order to enhance the attractiveness of the SPL scheme.)	4	0	0
14	Maximum liability amount.	Should be incorporated into the scheme - option b	2	1	1
18	Responding Registry Provider (RRP) fees.	Should be incorporated into the scheme - option b	3	1	0

Table 1: Summary of change requests and the support expressed during the public consultation

5 Detailed overview of the major change requests

This section provides the following details for each major change request:

- Description of the change request.
- SPL SPG recommendation provided as input to the public consultation.
- SPL SPG change proposal following the analysis of the public consultation results.
- Overview table containing the following information:
 - Contributor name.
 - Contributor support of the SPL SPG recommendation.
 - Contributor comments.
 - SPL SPG response on comments received.
- The Board decision on each SPL SPG change proposal.



5.1 # 1: Email address to be included as an additional alias

5.1.1 Description

This change request was provided by equensWorldline.

It proposes to include the email address as an additional alias to the IBAN. The format to be used should be “local-part@ domain-part”.

The email address is seen by the submitter as a more stable alias (with less frequent changes) compared to a mobile telephone number. Furthermore, the submitter notes that some providers have experiences in some fraud patterns related to the usage of prepaid mobile numbers and that it is difficult to check if a given mobile number is prepaid or post-paid.

5.1.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG suggests incorporating the change request as an optional feature in the next version (v2.0) of the SPL scheme rulebook (**option c**).

5.1.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal:

The SPL SPG proposes to incorporate the change request as an optional feature in the next version (v2.0) of the SPL scheme given that the majority of contributors support this SPL SPG recommendation. In response to a comment from a contributor it will be clarified that the SPL lookup request can only contain one proxy type (i.e. either a mobile number or an email address)

Public consultation feedback (including SPL SPG response):

Contributor	Support	Contributor comments	SPL SPG response
equensWorldline	No	In general we support the introduction of email address as an additional alias, but we suggest making it mandatory for RRPs to use an appropriate return code if they are unable to support this AliasType (e.g. "AliasType not supported").	As an alternative way to address this topic, the SPL SPG proposes to include an additional column in the SPL scheme register (EPC website) to indicate which scheme participants are supporting this optional feature. The SPL SPG plans to reassess the option of using appropriate return codes as part of the next maintenance cycle.
German Banking Industry Committee (GBIC) on behalf of the German banking community	Yes	It has to be clarified that the Originator can use "one" alias per SPL request or within the initiation of a transaction only (i.e. either a mobile number or an e-mail address)."	The SPL SPG agrees that it should be clarified in the SPL scheme rulebook that the IRP can only use one proxy (telephone number or



Contributor	Support	Contributor comments	SPL SPG response
			optionally email address) per SPL request.
Nordea Bank	Yes	If a new proxy category is introduced, then also a new parameter in the lookup and - response should be introduced, to indicate to what "universe" the proxy belongs. It shall be required that RRP validates that the user is in possession of the proxy. And keep in mind that once allowing a proxy other than a phone number, it will open up for discussions of demanding also for other types of proxies. (as item 10). Remember that additional proxy types will also increase the complexity of the query routing rules.	<p>The Berlin Group P2P mobile interoperability framework, on which the SPL API specification is based, provides a description of complex data types such as 'AliasType'. If 'AliasType' is "MSDN" then it is related to a mobile number. Another 'AliasType' will need to be used in case of an email address.</p> <p>The SPL scheme rulebook v1.0 stipulates that the RRP shall "Verify, before a proxy can be shared through the SPL service, that the proxy is in control of the account holder (i.e. payee), or otherwise authorised by the possessor of the proxy to link it to the destination account."</p> <p>As mentioned in the SPL scheme rulebook the aim would be to support other proxy types in the future. The SPL SPG acknowledges that this will increase the complexity of the query routing rules.</p>
Portuguese Banking Association	Yes		

5.1.4 Board decision

The change request is to be incorporated as an optional feature in the next version (v2.0) of the SPL scheme rulebook.



5.2 # 2: Increase scope to merchant payments (payments at POI)

5.2.1 Description

This change request was provided by equensWorldline.

The SPL scheme is currently limited to person-to-person payments between mobile payment-based schemes within the SEPA geographic area. This change request proposes to extend the scope to merchants' payments at the point of interaction (POI).

In this use case the consumer is registered at one local payment service provider (PSP) and wants to pay a merchant in another country, who is integrated with another PSP. The merchant would create a QR code including a payment token/link. The consumer would scan this QR code and the consumer's PSP would request the SPL service with this payment token/link to send it to the right merchant PSP. Each merchant PSP checks if the payment token/link belongs to them and if so, to send back the necessary payment data (merchant IBAN, name, amount and Transaction ID). This data will be used by the consumer's PSP to initiate the payment.

Optionally the QR code could already contain the SPL participation ID for the merchant's PSP. In this case the SPL service would not ask all attached merchant PSPs but could route the payment token/link to the right merchant PSP.

This new use case would extend the list of aliases with a payment token/link.

5.2.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG recommends not taking forward the change request in the next version (v2.0) of the SPL scheme rulebook (**option e**).

The SPL SPG does not see the need to use the SPL service in such a scenario. Moreover, there are other workstreams currently ongoing at European level that are focusing on this specific use case.

5.2.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal:

The SPL SPG proposes not to incorporate this change request in the next version (v2.0) of the SPL scheme rulebook given that the majority of contributors support the SPL SPG recommendation.

Public consultation feedback (including SPL SPG response):

Contributor	Support	Contributor comments	SPL SPG response
equensWorldline	Yes	We understand the recommendation, but this change request was based on feedback we had received from some providers. This feature would definitely improve the business case of the SPL service for these providers.	The SPL SPG noted this comment.
German Banking Industry	Yes		



Contributor	Support	Contributor comments	SPL SPG response
Committee (GBIC) on behalf of the German banking community			
Nordea Bank	No Opinion	<p>Prerequisite for Merchant POI payments is (3) Notifications of successfully initiated payments. The (6) Payment requests would also support Merchant POI payments, as the payment information could thus safely be unaltered delivered in the background.</p> <p>It is too early for SPL scheme to address Merchant POI payments.</p>	The SPL SPG would like to refer to section 1.5 of the SPL scheme rulebook which stipulates that "The Scheme is limited to a look-up function with the sole purpose of initiating a payment. The actual payment is however not part of the Scheme and is covered by an 'overseen' payment scheme within the SEPA Geographic Area."
Portuguese Banking Association	Yes		

5.2.4 Board decision

The Change Request is not to be included in the next version (v2.0) of the SPL scheme rulebook.



5.3 # 3: Notifications

5.3.1 Description

This change request was provided by equensWorldline.

It proposes that the following information would be exchanged via the SPL service:

- “Credit transfer initiated”: Message sent from the payer’s P2P provider to the payee’s P2P provider just after the related credit transfer has been initiated by the payer’s bank.
- “Money received”: Message sent from the payee’s P2P provider to the payer’s P2P provider just after the money has been received by the payee’s bank.

The submitter is of the view that in particular for a non-instant SEPA Credit Transfer (SCT) this information could be essential for the success of such a cross-border service.

5.3.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG recommends not taking forward the change request in the next version (v2.0) of the SPL scheme rulebook (**option e**).

The SPL SPG is of the view that it is out of scope of the SPL scheme which focuses on look-ups and not payments.

5.3.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal:

The SPL SPG proposes not to incorporate this change request in the next version (v2.0) of the SPL scheme rulebook given that the majority of contributors support the SPL SPG recommendation.

Public consultation feedback (including SPL SPG response):

Contributor	Support	Contributor comments	SPL SPG input
equensWorldline	Yes	We understand the recommendation, but this change request was based on feedback we had received from providers. This feature would definitely improve the usability of the SPL service - especially in the case where instant payments are not yet offered by PSPs.	The SPL SPG noted this comment.
German Banking Industry Committee (GBIC) on behalf of the German banking community	Yes		



Contributor	Support	Contributor comments	SPL SPG input
Nordea Bank	No	<p>Notifications of "successfully initiated payments" are essential for the RRP for indicating received payments, as the SPL scheme and payment rails are separated.</p> <p>Notifications become even more important if the payment rail is not real-time, or the payee's service provider is a TPP (PDS2) without internal access to payee's bank account.</p> <p>Related to identifying incoming SPL based payments: For the payee's account service provider to be able to identify the received SPL payments on the bank account, a category-identifier in payment is needed.</p> <p>Proposal: Instruct the payment initiator to include e.g. the ISO20022 ExternalCategoryPurpose1Code to the payment:</p> <ul style="list-style-type: none">- MP2B Commercial Mobile P2B Payment- MP2P Consumer Mobile P2P Payment <p>https://www.iso20022.org/external_code_list.page</p> <p>(SEPA instant provides confirmation of successful payment to payer, thus a "money received" notification is unnecessary when using SEPA instant as the payment rail.)</p>	The SPL SPG would like to refer to section 1.5 of the SPL scheme rulebook which stipulates that "The Scheme is limited to a look-up function with the sole purpose of initiating a payment. The actual payment is however not part of the Scheme and is covered by an 'overseen' payment scheme within the SEPA Geographic Area." As a result, notifications related to payments are considered to be out of scope.



Contributor	Support	Contributor comments	SPL SPG input
Portuguese Banking Association	Yes		

5.3.4 Board decision

The Change Request is not to be included in the next version (v2.0) of the SPL scheme rulebook.



5.4 # 4: Allow scheme participants from outside Europe

5.4.1 Description

This change request was made by equensWorldline.

It proposes to extend the eligibility criteria that are currently defined in section 2.1 of the SPL scheme rulebook, in order to allow scheme participants from outside Europe.

Underlying use cases include guest worker and family related transfers (e.g. kids studying outside of Europe).

The impact of the use case of remittance payments from Europe to the “rest of the world” is very high. There are already now many transactions with high amounts.

There is also a need for an alias lookup service for these non-European transactions.

The submitter is of the view that it would be a very attractive extension for the European P2P providers to offer such a service also for non-European transactions.

5.4.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG recommends not taking forward the change request in the next version (v2.0) of the SPL scheme rulebook as it is not considered fit for the SEPA geographic area (**option d**).

The scope of the SPL scheme focuses on the SEPA geographic area (i.e. SEPA countries listed in the EPC List of SEPA Scheme Countries (document EPC409-09¹, as amended from time to time).

5.4.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal:

The SPL SPG proposes not to incorporate this change request in the next version (v2.0) of the SPL scheme rulebook given that all contributors support the SPL SPG recommendation.

Public consultation feedback (including SPL SPG response):

Contributor	Support	Comments received	SPL SPG response
equensWorldline	Yes		
German Banking Industry Committee (GBIC) on behalf of the German banking community	Yes		
Nordea Bank	Yes	Expanding the SPL participation from outside Europe requires thoroughly evaluation before expansion:	The SPL SPG noted this comment.

¹ <https://www.europeanpaymentscouncil.eu/document-library/other/epc-list-sepa-scheme-countries>



Contributor	Support	Comments received	SPL SPG response
		<p>- Laws and regulations may be different/contradicting between Europe and participant home market, e.g. GDPR.</p> <p>- Operating licences requirements apply.</p> <p>The payment initiating service provider shall always be provided reliable payee information and be allowed to apply risk-based evaluation and screening, for deciding to or not to initiate the payments.</p>	
Portuguese Banking Association	Yes		

5.4.4 Board decision

The Change Request is not to be included in the next version (v2.0) of the SPL scheme rulebook.



5.5 # 6: Payment requests

5.5.1 Description

This change request was made by equensWorldline.

It proposes to extend the scope of the SPL scheme to accommodate payment requests by the payee in case the payer does not know the amount or has simply forgotten.

In this scenario, the P2P provider of the payee would send a request to the SPL service containing the mobile number (more generic – alias) of the payer together with the payment data (payee IBAN, payee name, amount, payment purpose/text).

The SPL service would first retrieve the appropriate payer's P2P provider and then transfer the payment data to that provider. The payer's P2P provider can subsequently initiate the credit transfer by using the transferred payment data.

The submitter is of the view that this extension would fully fit into the initial SPL scheme purpose to support the retrieval of all necessary information between payer and payee to execute a credit transfer. The main advantage of such an approach would be that the payment data would not be exchanged using an unsafe communication channel such as mail or a messenger app.

5.5.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG recommends not taking forward the change request in the next version (v2.0) of the SPL scheme rulebook change request (**option e**).

The SPL SPG does not see the need to use the SPL service in such a scenario. Moreover, there is a Request to Pay workstream currently ongoing within the EPC that is focusing on this specific use case.

5.5.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal:

The SPL SPG proposes not to incorporate this change request in the next version (v2.0) of the SPL scheme rulebook given that the majority of contributors support the SPL SPG recommendation.

Public consultation feedback (including SPL SPG response):

Contributor	Support	Comments received	SPL SPG response
equensWorldline	Yes	We understand the recommendation and recommend staying in touch with the RTP MSG to see where SPL could support such a functionality.	The SPL SPG noted this comment.
German Banking Industry Committee (GBIC) on behalf of the	Yes		



Contributor	Support	Comments received	SPL SPG response
German banking community			
Nordea Bank	No	Payment request from payee to payer are essential for C2B eCom payments, to ensure that the payment contains correct and unaltered reference information and amount.	The SPL SPG would like to inform that as stipulated in section 5.2 (Annex 5), the focus of the SPL scheme is initially on person-to-person (P2P) payments.
Portuguese Banking Association	Yes		

5.5.4 Board decision

The Change Request is not to be included in the next version (v2.0) of the SPL scheme rulebook.



5.6 # 7: Support customer onboarding

5.6.1 Description

This change request was made by equensWorldline.

It proposes to offer providers the possibility to use the SPL service - in the onboarding phase of a new client - for checking the (mobile) phone book in order to be able to detect whether certain contacts are also registered at the same provider. New subscribers will immediately see which friends and family members are covered by the same network.

This use case can be implemented via a new API call that will be similar to the existing lookup request but only returns a YES/NO answer for the given mobile number.

This approach would support the onboarding of new customers and would prevent the database “harvesting” (get all user data) from other providers.

For performance reasons there also should be a request for a set of mobile numbers.

5.6.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG suggests incorporating the change request into the scheme as an optional feature in the next version (v2.0) of the SPL scheme rulebook (**option c**).

5.6.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal:

The SPL SPG proposes to incorporate the change request as an optional feature in the next version (v2.0) of the SPL scheme given that the majority of contributors support the SPL SPG recommendation.

Public consultation feedback (including SPL SPG response):

Contributor	Support	Comments received	SPL SPG input
equensWorldline	No	In general we support the introduction of such a customer onboarding functionality, but we suggest making it mandatory for RRPAs to use an appropriate return code if they are unable to support this functionality (e.g. "Reachability check not supported") or if they support the functionality but cannot process bulk requests (e.g. "Bulk check not supported"). For IRPs it is important to know if it makes sense to request such a set of information.	As an alternative way to address this topic, the SPL SPG proposes to include an additional column in the SPL scheme register (EPC website) to indicate which scheme participants are supporting this optional feature. The SPL SPG plans to reassess the option of using appropriate return codes as part of the next maintenance cycle.



Contributor	Support	Comments received	SPL SPG input
German Banking Industry Committee (GBIC) on behalf of the German banking community	Yes	This could cause a data protection issue if the agreed Terms & Conditions of the Responding Party with the customer does not cover such requests.	The SPL SPG would like to refer to section 2.5.1 of the SPL scheme rulebook (v1.0) which stipulates that “the RRP shall ensure that all required consents have been collected for any information disclosed via the SPL service”.
Nordea Bank	Yes	<p>It would be supportive for both service providers and the payer to be able to determine pre-payment if an intended payee is available through the network.</p> <p>Notice that this feature will increase the messaging traffic.</p>	The SPL SPG acknowledges the fact that this optional feature will have an impact on the messaging traffic.
Portuguese Banking Association	Yes		

5.6.4 Board decision

The change request is to be incorporated as an optional feature in the next version (v2.0) of the SPL scheme rulebook.



5.7 # 8: Disclosure information by Initiating Registry Provider (IRP) to its customers

5.7.1 Description

This change request was provided by Latvijas Banka.

It suggests changing the current rule that stipulates that “the initiating registry provider (IRP) that is receiving information from an SPL enquiry is **under no obligation to disclose** all of that information to its customers” into “the initiating registry provider (IRP) that is receiving information from an SPL enquiry is **obliged to disclose** all of that information to its customers” (section 2.5.1 Obligations of an Initiating Registry Provider).

In addition, it is proposed that this change shall also be reflected in section 5.7.3 List of Data Elements for the SPL Response (Annex V), where Name Beneficiary (AT – 12) shall be included if the beneficiary has given consent to keep the data in the SPL and share it with the payer.

The submitter is of the view that if the beneficiary explicitly consents to the sharing of its name to the SPL service and (logically) to the payer, it shall not be possible for the responding registry provider (RRP) and IRP to overrule this decision.

5.7.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG recommends not taking forward the change request in the next version (v2.0) of the SPL scheme rulebook (**option e**).

The SPL SPG has however submitted an alternative change request related to the above (see section 6, item #12).

5.7.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal:

The SPL SPG proposes not to incorporate this change request in the next version (v2.0) of the SPL scheme rulebook given that the majority of contributors (who voted either “yes” or “no”) support the SPL SPG recommendation.

Public consultation feedback (including SPL SPG response):

Contributor	Support	Comments received	SPL SPG response
equensWordline	No opinion		
German Banking Industry Committee (GBIC) on behalf of the German banking community	Yes		
Nordea Bank	No	IRP shall be allowed/obliged to display the receivers name to the payer, prior payers'	The SPL SPG is planning to revisit this topic during the next change management cycle



Contributor	Support	Comments received	SPL SPG response
		<p>approval of the payment initiation.</p> <p>Note, the payee's IBAN is usually visible for the payer in SEPA payment rails. And this visibility may not be in control of the IRP.</p> <p>Add to the requirement: RRP shall strongly validate that the name is correct and that the user is the owner of the corresponding bank account. It is essential for the payer to assure that the payment is initiated to the correct receiver.</p>	<p>(also taking into account developments in other groups).</p> <p>The SPL SPG would like to refer to section 2.5.2 of the SPL scheme rulebook where it is stipulated that the RRP shall “verify, before a proxy can be shared through the SPL service, that the proxy is in control of the account holder (i.e. payee), or otherwise authorised by the possessor of the proxy to link it to the destination account” and “guarantee the accuracy of the revealed identity of the beneficiary (if applicable) in a lookup”.</p>
Portuguese Banking Association	Yes		

5.7.4 Board decision

The Change Request is not to be included in the next version (v2.0) of the SPL scheme rulebook.



5.8 # 9: Additional end-to-end data security/integrity requirement

5.8.1 Description

This change request was provided by the Polish Bank Association.

It proposes to require additional end-to-end data security/integrity (in addition to Transport Layer Security (TLS)), based on signatures within JavaScript Object Notation (JSON) message (e.g. JSON Web Signature).

The current data security model of the SPL communication is based on TLS, for both confidentiality and integrity. Since TLS is usually terminated in load balancers using TLS off-load, the traffic sent then within the party's datacentre to/from application servers consuming/issuing the JSON messages is not covered with end-to-end security. They however may be secured with local security encryption/signatures between load balancers and application servers.

Point-to-point security, as opposed to end-to-end, increases the risk of data manipulation, which could result in fraudulent transactions. The strongest threat is the possibility to replace the genuine IBAN with a fraudster's one, in any of the connecting points, between the point-to-point security domains, resulting in the money transfer directed to the fraudster's account.

Since the integrity of IBAN is crucial for the SPL service, the submitter is of the opinion that a single layer of security (TLS) is not enough.

5.8.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG suggests incorporating the change request into the next version (v2.0) of the SPL scheme rulebook (**option b**).

5.8.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal

The SPL SPG proposes to postpone the possible incorporation of the change request until the next change management cycle. All contributors support the SPL SPG recommendation but in view of comments received it seems that further analysis would be required to establish the concrete impact of this change request on the SPL scheme as well as on the SPL service. Another reason to postpone is the ongoing ETSI standardisation work related to API signatures which is relevant in the context of providing additional end-to-end security.

Public consultation feedback (including SPL SPG response):

Contributor	Support	Comments received	SPL SPG response
equensWorldline	Yes	<p>This major change has a big impact on the API, the implementation, the onboarding process and all integrations.</p> <p>Today each provider exchanges with the technical SPL provider</p>	<p>SPL SPG agrees to postpone the possible incorporation of this change request (see SPL SPG Change Proposal above).</p>



Contributor	Support	Comments received	SPL SPG response
		(currently us) certificates for the mutual authentication. With this change, each IRP/RRP has to create public/private keys and publish the public keys to all other providers. So there is the need of a centralised PKI and an appropriate key management.	
German Banking Industry Committee (GBIC) on behalf of the German banking community	Yes		
Nordea Bank	Yes	Increased data integrity validation is supported. But the change request did not include any solution proposal.	SPL SPG agrees to postpone the possible incorporation of this change request (see SPL SPG Change Proposal above).
Portuguese Banking Association	Yes		

5.8.4 Board decision

The possible inclusion of the Change Request is to be postponed until the next change management cycle.



5.9 # 10: Extending proxies & revisit/update participants eligibility requirements

5.9.1 Description

This change request was made by MasterCard.

It proposes the following two changes:

- Consider extending the nature of proxies to incorporate new ones beyond the mobile number. This potentiality is already contemplated in the rulebook (section 1.1.). The request is to develop a work-plan/calendar to add a set of new, additional proxy types, account identifiers and use cases.
- Along the same lines, in conjunction with the above, revisit and update participants' eligibility requirements in order to enlarge the attractiveness of the SPL scheme to all/new potential innovation/technologies/use-cases.

5.9.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG is of the view that this change request is already provided for in the scheme, and that hence no further action is necessary (**option a**).

Indeed, in section 1.1 of the SPL scheme rulebook it is already stipulated that "It is envisaged that the Scheme will evolve over time to support additional proxy types, account identifiers and use cases". Also, see major change request #1 (section 5.1).

The SPL SPG is however interested to learn from the market what other proxy types, account identifiers and use cases would be required in order to enhance the attractiveness of the SPL scheme.

5.9.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal

The SPL SPG proposes not to incorporate the change request in the next version (v2.0) of the SPL scheme given that all contributors support the SPL SPG recommendation.

It should be noted in this context that the SPL SPG proposes to include the email address as an optional feature in version 2.0 of the SPL scheme rulebook (see section 5.1). Moreover, no input was received concerning which additional proxy types, account identifiers and use cases should be supported.

Public consultation feedback (including SPL SPG response):

Contributor	Support	Comments received	SPL SPG response
equensWorldline	Yes		
German Banking Industry Committee (GBIC) on behalf of the	Yes		



Contributor	Support	Comments received	SPL SPG response
German banking community			
Nordea Bank	Yes	See notes of item 1: a parameter for indicating the different proxy types are needed." (see section 5.1)	The Berlin Group P2P mobile interoperability framework, on which the SPL API specification is based, provides a description of complex data types such as 'AliasType'. If 'AliasType' is "MSDN" then it is related to a mobile number. Another 'AliasType' will need to be used for other proxy types.
Portuguese Banking Association	Yes		

5.9.4 Board decision

The Change Request is not to be included in the next version (v2.0) of the SPL scheme rulebook.



5.10 # 14: Maximum liability amount

5.10.1 Description

This change request was provided by the SPL SPG.

In section 2.6.2 ‘Limits on liability’ of the SPL scheme rulebook it is noted that “The maximum amount which may be claimed in respect of a Loss is [Tbd]”.

This change request proposes to stipulate that “The maximum amount which may be claimed in respect of a loss is the fee paid to the responding registry provider (RRP) for the provision of the data.”

5.10.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG suggests incorporating the change request into the scheme in the next version (v2.0) of the SPL scheme rulebook (**option b**).

5.10.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal

The SPL SPG proposes to incorporate the change request in the next version (v2.0) of the SPL scheme given that the majority of contributors (who voted either “yes” or “no”) supports this SPL SPG recommendation.

Public consultation feedback (including SPL SPG response):

Contributor	Support	Comments received	SPL SPG input
equensWorldline	No opinion		
German Banking Industry Committee (GBIC) on behalf of the German banking community	Yes		
Nordea Bank	Yes	The maximum liability should be limited to the service fee. Additionally, a standpoint should be stated for cases including gross neglect or rulebook violation.	The SPL SPG would like to refer to section 2.6.2 of the SPL scheme rulebook with stipulates that “The cap on liability applies even if there has been gross negligence by the liable Participant, its employees or agents.” Moreover, as stipulated in section 2.8.2 of the SPL scheme rulebook, the Compliance and Adherence Committee is responsible for investigating



Contributor	Support	Comments received	SPL SPG input
			complaints made against Participants for alleged breached of the Rulebook. The SPL SPG plans to revisit this topic as part of the next change maintenance cycle.
Portugal	No	The risks to be taken and the fees involved are unclear and more information should be provided for decision.	The SPL SPG plans to revisit this topic as part of the next change maintenance cycle.

5.10.4 Board decision

The Change Request is to be included in the next version (v2.0) of the SPL scheme rulebook.



5.11 # 18: Responding Registry Provider (RRP) fees

5.11.1 Description

This change request was provided by the SPL SPG.

It proposes to include the following stipulation in section 2.3 “Becoming a Participant” to clarify the possibility for a responding registry provider to charge a fee:

A Participant in its role of RRP may decide to charge a fee in exchange of services provided to and received by the initiating registry provider (IRP). Fees should be clearly justifiable and established in a non-discriminatory and transparent way, that does not raise barriers to enter the scheme or exclude actual or potential competitors. Furthermore, fees should under no circumstances go beyond the objective of achieving efficiencies related to the scheme nor interfere with the actual payment, which remains outside the scope of the scheme.

5.11.2 SPL SPG analysis and recommendation as input to the public consultation

The SPL SPG suggests incorporating the change request into the scheme in the next version (v2.0) of the SPL scheme rulebook (**option b**).

5.11.3 SPL SPG Change Proposal and public consultation comments received

SPL SPG Change Proposal:

The SPL SPG proposes to incorporate the change request in the next version (v2.0) of the SPL scheme given that the majority of contributors support this SPL SPG recommendation.

Public consultation feedback (including SPL SPG response):

Contributor	Support	Comments received	SPL SPG response
equensWorldline	No	<p>The introduction of such a fee will have many major consequences/issues:</p> <ul style="list-style-type: none">- Today each provider has one "contract" with the SPL scheme and one contract with the technical SPL provider (currently us). So there are no contracts between the two of them. Where would be the legal space to define such fees and liability clauses?- Who would be responsible to collect the money from the different providers at the end of the billing period? Who will manage the disputes that are resulting from such a billing	<p>How the billing is to be performed should be left to the market. It should however be based on the statistics the scheme participants (IRPs/RRPs) received from the SPL service provider(s).</p> <p>The SPL SPG would also like to highlight that an IRP cannot 'choose' to only get responses from RRs that do not charge a fee as this would be considered a breach of the rulebook. By signing an SPL scheme adherence agreement with the EPC, the scheme participant accepts the fact that RRs have the option to charge a fee.</p>



Contributor	Support	Comments received	SPL SPG response
		<p>process? Who pays for such a service?</p> <ul style="list-style-type: none"> - How can an IRP only ask to get SPL responses that are "free"? Today IRPs do not charge their end-users - so, who will pay them? This leads to a worse business case. - SPL returns today only one answer (based on the polling algorithms) - so this mechanism has to be extended to support "free of charge responses only". - This change results in a major API, implementation and integration change. Potentially it would also effect the contract with the technical provider (us)." 	
German Banking Industry Committee (GBIC) on behalf of the German banking community	Yes		
Nordea Bank	Yes	<p>The IRP shall be aware of the usage costs prior SPL query and payment initiation. Notice that the participants have a contractual relationship only with SPL/Worldline, there are no bilateral contracts between all the SPL participants. RRP fees need to be handled and centrally coordinated by SPL scheme.</p>	<p>The paragraph that is the subject of this change request stipulates that the RRP fees should be "established in a non-discriminatory and transparent way". It is hence a mandatory prerequisite that the RRP fees are published on the website of the scheme participant that decides to charge a fee in its role of an RRP. On the other hand, an IRP will however not know in advance from which RRP it will receive a response as this results from the routing algorithm as described in</p>



Contributor	Support	Comments received	SPL SPG response
			section 5.8.3 of Annex 5 'SPL API specification'. Also please see the response to the comment of equensWorldline.
Portuguese Banking Association	Yes		

5.11.4 Board decision

The Change Request is to be included in the next version (v2.0) of the SPL scheme rulebook.



6 Change Management Process in respect of minor changes

6.1 Publication of list of minor changes

The SPL SPG had identified a number of minor changes which it considered necessary for the SPL scheme rulebook. These minor changes were included in document “SPL Scheme Rulebook 2019 Change Request Public Consultation Document” (EPC103-19) which was published on the EPC website.

6.2 Comments on the minor changes during the public consultation

Stakeholders can optionally submit comments on the list of minor changes covered in document “SPL Scheme Rulebook 2019 Change Request Public Consultation Document” (EPC103-19).

No comments were received.

6.3 List of minor changes to be included in the SPL scheme rulebook V2.0

CR N°	Section	Description	Reason for change	Type of Change
#5	Annex V, Section 5.7.2	<p>As stated in section 1.3 ‘Application to SEPA’, the SPL scheme is applicable in the countries listed in the EPC List of SEPA Scheme Countries, as amended from time to time (the “SEPA geographic area”).</p> <p>The SPL scheme rulebook is currency agnostic.</p> <p>In Annex V, Section 5.7.2 ‘List of data elements for the SPL request’: element ‘Transaction Amount’ is described as “The transaction amount in Euros” (as per the Mobile P2P Interoperability Framework - Implementation Guidelines § 3.3.1.). This section will be updated to remove the limitation to euro. Also see #Change request 5 (EPC103-19) “Support non-EUR currencies for the amount parameter” from equensWorldline.</p>	Ensure consistency between the rulebook and the API specification in Annex V.	CHAN
#11	Section 2.1	Update text as follows (see bold text): “is a legal entity representing and, directly (e.g. PSP association) or indirectly (e.g. association of PSP associations, entity owned by a PSP	Clarify difference between "directly" and "indirectly."	CLAR



		association), having as members PSPs, and being established in a country or territory included within the SEPA geographic area"		
#12	Section 2.5.1	Update text as follows (see bold text): "It should be noted that the IRP that is receiving information from an SPL enquiry is under no obligation to may disclose all of that information to its customers."	Additional clarification to accommodate a scenario whereby the initiating registry provider (IRP) cannot disclose the information (e.g. due to local regulation).	CLAR
#13	Chapter 2.5.2	Update text as follows (see bold text) in replacement of the word "inaccurate": "It should be noted that the RRP will be liable in case the response does not reflect the content of the latest valid version of the RRP's database corresponding with the request of the IRP, and results for example in a response to the wrong request or the provision of a name that does not match the IBAN. "	Further clarification.	CLAR
#15	Annex 5 – Section 5.5.3	Update text as follows (see bold text): "• Not store the IBAN of the beneficiary of the payment for any other purpose than the corresponding payment or dispute resolution; "	Further clarification.	CLAR
#16	Annex 5 – Section 5.5.1	Update figure 1 'High Level Functional Model for the SEPA Proxy Lookup': remove numbers as well as block "payment system".	Update of figure 1.	CHAN
#17	Section 2.12	Update text as follows (see bold text): "Further, each Participant (whether or not subject to the GDPR) shall refrain, to the extent reasonably possible, from exercising any rights accorded to it under its national law vis-à-vis other Participants and vis-à-vis its Customers that either conflict	Further clarification.	CLAR



		or that could potentially conflict with the relevant provisions of the applicable data protection regulation, notably GDPR. "		
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7 Additional updates

In addition to the aforementioned minor and major changes, there are also a number of editorial updates that will be included in the next version of the SPL scheme rulebook to provide further clarification, ensure alignment with updated EPC processes or regulations or to correct typos.

All the changes made compared to version 1.0 of the SPL scheme rulebook will be listed in an annex of version 2.0 of the rulebook.



ANNEX I: List of contributors

Comments were received from the following contributors during the public consultation:

Nº	List of contributors
1	EquensWorldline
2	German Banking Industry Committee (GBIC) on behalf of the German banking community represented by the following German banking associations: <ul style="list-style-type: none">• Bundesverband der Deutschen Volks- und Raiffeisenbanken e.V.• Bundesverband deutscher Banken e.V.• Bundesverband Öffentlicher Banken Deutschlands, VÖB, e.V.• Deutscher Sparkassen und Giroverband e.V.
3	Nordea Bank
4	Portuguese Banking Association (Associação Portuguesa de Bancos)